

III. REMARKS

1. Claims 1-14 remain in the application. Claims 1-5 and 8-12 have been amended.
2. Claim 1 has been amended to overcome the 35 USC 112, first paragraph rejection.
3. Claim 4 has been amended to correct the informality and to overcome the 35 USC 112, second paragraph rejection.
4. Claims 1-5 and 8-12 have been added to overcome the 35 USC 101 rejection.

The amendments to the claims are not limiting, are not made for reasons related to patentability, and do not raise issues of estoppel.

5. Applicant respectfully submits that claims 1, 3, 5, 6, 8, 12, and 13 are not anticipated by Kresina et al. (US 2003/0074324, "Kresina") under 35 USC 102(e).

Kresina fails to disclose or suggest:

an indicia pool of PSD's for generating indicia;

a download pool of PSD's for refreshing PSD funds; and

a system manager program for allocating one or more of the PSD's among the indicia pool and download pool according to indicia generating requirements and funding amounts within the one or more PSD's;

as recited by claim 1. Kresina describes a system for providing postal services such as key management, funds

telemetering, software and rate updates to a number of remote postal printing stations. The system may communicate with and provide these services to number of PSD's and may also track them through their life cycles (see paragraphs 0021 and 0024). In contrast, the present invention is directed to a system that dynamically allocates PSD's among different pools depending upon indicia generating requirements and remaining funds.

There is nothing in Kresina related to dynamically allocating the PSD's among groups of PSD's such as an indicia pool of PSD's and a download pool of PSD's. Kresina provides funding, keys and certificates to the PSD's but does not group them into pools of PSD's.

Furthermore, there is nothing in Kresina about a system manager program that performs PSD allocation among the pools based on indicia generating requirements and funding amounts within the one or more PSD's. Kresina's system simply provides services to individual PSD's as required.

Paragraphs 0032, 0033, and 0027 of Kresina, cited in the present Action a describe a PSD, key management for the PSD, and funds management, respectively. Paragraph 0024 describes how a server operates as a router between the PSD's connecting from customer sites and the funds management and key management systems. There is nothing in these paragraphs related to an indicia pool of PSD's, a download pools of PSD's, or a system manager program that allocates PSD's among the pools.

Applicant understands that the paragraphs are cited as exemplary, however, carefully reading Kresina in its entirety

fails to reveal anything related to an indicia pool of PSD's, a download pools of PSD's, or a system manager program that allocates PSD's among the pools.

Independent claim 8 is directed to similar subject matter.

At least for these reasons, Applicants submit that Kresina does not anticipate independent claims 1 and 8, and dependent claims 3, 5, 6, 12, and 13.

6. Applicants respectfully submit that claims 4, 7, and 14 are patentable over Kresina under 35 USC 103(a).

Claims 4, 7, and 14 depend from claims 1 or 8. Kresina fails to disclose or suggest all the features of claims 1 and 8 as argued above and therefore fails to render claims 4, 7, and 14 unpatentable.

7. Applicants respectfully submit that claims 2 and 9-11 are patentable over the combination of Kresina and Ogg (US 2005/0075990).

Claims 2 and 9-11 depend from claims 1 or 8. Ogg fails to supply the features missing from Kresina, specifically, an indicia pool of PSD's for generating indicia, a download pool of PSD's for refreshing PSD funds, and allocating one or more of the PSD's among the indicia pool and download pool according to indicia generating requirements and funding amounts within the one or more PSD's, as recited by independent claims 1 and 8.

Therefore, the combination of Kresina and Ogg fails to render claims 2 and 9-11 unpatentable.

It is respectfully submitted that all of the claims present in the application are clearly novel and patentable, and are in proper form for allowance. Accordingly, favorable consideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


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21 March 2006
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